

EXHIBIT 1

CLEMENT SETH ROBERTS (STATE BAR NO. 209203)
croberts@orrick.com
BAS DE BLANK (STATE BAR NO. 191487)
basdeblank@orrick.com
ALYSSA CARIDIS (STATE BAR NO. 260103)
acaridis@orrick.com
EVAN D. BREWER (STATE BAR NO. 304411)
ebrewer@orrick.com
ORRICK, HERRINGTON & SUTCLIFFE LLP
The Orrick Building
405 Howard Street
San Francisco, CA 94105-2669
Telephone: +1 415 773 5700
Facsimile: +1 415 773 5759

GEORGE I. LEE (*pro hac vice in process*)
lee@ls3ip.com
SEAN M. SULLIVAN (*pro hac vice in process*)
sullivan@ls3ip.com
RORY P. SHEA (*pro hac vice in process*)
shea@ls3ip.com
J. DAN SMITH (*pro hac vice in process*)
smith@ls3ip.com
Cole B. Richter (*admitted pro hac*)
richter@ls3ip.com
LEE SULLIVAN SHEA & SMITH LLP
656 W Randolph St., Floor 5W
Chicago, IL 60661
Telephone: +1 312 754 0002
Facsimile: +1 312 754 0003

Attorneys for Defendant Sonos, Inc.

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

GOOGLE LLC,

Plaintiff,

v.

SONOS, INC.,

Defendant.

Case No. 3:20-cv-6754

**SONOS, INC.'S DISCLOSURE OF
ASSERTED CLAIMS AND
INFRINGEMENT CONTENTIONS**

Honorable William Alsup

1 Sonos source code that demonstrates the operation of the Sonos products identified above
2 pursuant to L.R. 3-1(g).

3 Moreover, Sonos is in possession of certain additional documents that may fall under
4 Patent L.R. 3-2(e) but such documents contain information that is subject to third-party
5 confidentiality obligations. Sonos is endeavoring to comply with these confidentiality obligations
6 and will produce these certain additional documents as soon as Sonos is permitted pursuant to the
7 third-party confidentiality obligations.

8 **F. Documents Pursuant to Patent L.R. 3-2(f)**

9 Although Sonos is not aware of any agreements that transfer any ownership interest in the
10 Asserted Patents, for the avoidance of doubt, Sonos has produced certain non-exclusive patent
11 license agreements and covenants not to sue bearing production numbers SONOS-SVG2-
12 00042905 through SONOS-SVG2-00042944. Sonos is in possession of certain additional non-
13 exclusive patent license agreements and covenants not to sue but is prohibited from producing
14 such agreements pursuant to third-party confidentiality obligations.

15 Moreover, Sonos herein incorporates by reference Sonos's Objections and Responses to
16 Google LLC's First Set of Interrogatories (No. 13). *See* Sonos, Inc.'s Objections and Responses
17 to Google LLC's First Set of Interrogatories (Nos. 1-20) (dated September 7, 2021).

18 **G. Documents Pursuant to Patent L.R. 3-2(g)**

19 Sonos states that it has covenanted not to sue DEI Sales, Inc., and subsidiaries that existed
20 as of May 17, 2018, for patent infringement, granted a patent license to Lenbrook Industries
21 Limited and relevant subsidiaries on July 28, 2020, and granted a patent license to Pass &
22 Seymour, Inc. on December 7, 2020.

23 Pursuant to Patent L.R. 3-2(g), Sonos states that it has produced the Lenbrook Industries
24 Limited and Pass & Seymour, Inc. agreements at SONOS-SVG2-00042905 through SONOS-
25 SVG2-00042944. The DEI Sales, Inc. agreement is subject to third-party confidentiality
26 obligations and, after inquiry, Sonos is unable to produce this agreement subject to those
27 obligations.
28

1 Dated: October 21, 2021

LEE SULLIVAN SHEA & SMITH LLP

2 By: /s/ Cole B. Richter

3 Cole B. Richter (*admitted pro hac*)

4
5 Clement Seth Roberts
6 California Bar No. 209203
7 ORRICK, HERRINGTON & SUTCLIFFE LLP
8 405 Howard St.
9 San Francisco, CA 94105
10 Telephone: 415.773.5484
11 Facsimile: 415.773.5759
12 croberts@orrick.com

13
14 Bas de Blank
15 California Bar No. 191487
16 ORRICK, HERRINGTON & SUTCLIFFE LLP
17 1000 Marsh Blvd.
18 Menlo Park, CA 94205
19 Telephone: 650.614.7343
20 Facsimile: 650.614.7401
21 bdeblank@orrick.com

22
23 Alyssa Caridis
24 California Bar No. 260103
25 ORRICK, HERRINGTON & SUTCLIFFE LLP
26 777 South Figueroa St., Suite 3200
27 Los Angeles, CA 90017
28 Telephone: 213.612.2372
Facsimile: 213.612.2499
acaridis@orrick.com

George I. Lee (*pro hac pending*)
Sean M. Sullivan (*pro hac pending*)
Rory P. Shea (*pro hac pending*)
J. Dan Smith (*pro hac pending*)
Michael P. Boyea (*pro hac pending*)
Cole B. Richter (*pro hac pending*)
LEE SULLIVAN SHEA & SMITH LLP
656 W. Randolph St., Floor 5W
Chicago, IL 60661
Telephone: 312.754.9602
Facsimile: 312.754.9603
lee@ls3ip.com
sullivan@ls3ip.com
shea@ls3ip.com
smith@ls3ip.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

boyea@ls3ip.com
richter@ls3ip.com

Attorney for Sonos, Inc.